

Ryan E. Johnson (Nevada Bar # 9070)
WATSON ROUNDS
777 N. Rainbow Blvd., Suite 350
Las Vegas, NV 89107
(702) 636-4902 (phone)
(702) 636-4904 (facsimile)
rjohnson@watsonrounds.com

Stephen M. Gaffigan (*Pro Hac Vice* pending)
STEPHEN M. GAFFIGAN, P.A.
401 East Las Olas Blvd., Suite 130-453
Ft. Lauderdale, Florida 33301
Telephone: (954) 767-4819
Facsimile: (954) 767-4821
stephen@smgpa.net

Attorneys for Plaintiff
LOUIS VUITTON MALLETIER, S.A.

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

LOUIS VUITTON MALLETIER, S.A.,
a foreign business entity,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A" and
DOES 1-1000,

Defendants.

Case No.

COMPLAINT FOR INJUNCTIVE RELIEF

Plaintiff Louis Vuitton Malletier, S.A., ("Plaintiff" or "Louis Vuitton") hereby sues Defendants, The Partnerships and Unincorporated Associations identified on Schedule "A" hereto and Does 1-1000 (collectively "Defendants"), and alleges as follows:

JURISDICTION AND VENUE

1. This is an action pursuant to 15 U.S.C. §§ 1114, 1116, 1121 and 1125(a) and (d). Accordingly, this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.

2. Venue is proper in this Court pursuant 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants since all Defendants directly target business activities towards consumers in Nevada and cause harm to Louis Vuitton's business within this District through at least the fully interactive Internet websites operating under their partnership and/or business association names (the "Subject Domain Names").

THE PLAINTIFF

3. Louis Vuitton is a corporation duly organized under the laws of The Republic of France with its principal place of business located in the Paris, France. Louis Vuitton is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this Judicial District, high quality luxury goods under multiple famous common law and Federally registered trademarks including those identified in Paragraph 13 below. Louis Vuitton offers for sale and sells its trademarked goods within this Judicial District. Defendants' sales of counterfeit Louis Vuitton branded products are causing damage to Louis Vuitton within this Jurisdiction. Louis Vuitton regularly enforces its intellectual property rights and authorized that this action be brought in its name.

4. Like all other famous trademark owners in the field of luxury goods, Louis Vuitton suffers ongoing daily and sustained violations of its trademark rights at the hands of criminals such as the Defendants herein, who wrongfully reproduce and counterfeit Louis Vuitton's trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with the Louis Vuitton name and associated trademarks.

5. In order to combat the harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Louis Vuitton expends millions of dollars in connection with trademark enforcement efforts, including legal fees, investigative fees and support mechanisms for law enforcement such as field training guides and seminars. The recent explosion of counterfeiting over the Internet has created an environment which requires Louis Vuitton to file a massive number of lawsuits, often it turns out, against the same individuals and groups, in order to protect both consumers and itself from the ill effects of confusion and the erosion of the goodwill connected to

1 the Louis Vuitton brand. The financial burden on Louis Vuitton and companies similarly situated is
2 staggering as is the resulting burden on the Federal court system.

3 THE DEFENDANTS

4 6. Defendants are partnerships or unincorporated business associations which reside on
5 servers in the United States and are comprised of individuals and business entities of unknown
6 makeup who likely reside in the People's Republic of China or other foreign jurisdictions with lax
7 trademark enforcement systems. Defendants have the capacity to be sued pursuant to Federal Rule
8 of Civil Procedure 17(b). Defendants conduct business throughout the United States, including
9 within this Judicial District through the operation of the fully interactive commercial websites
10 operating under the Subject Domain Names identified on Schedule "A" hereto. Defendants also
11 operate blog style websites under some of the Subject Domain Names which also provide support
12 and direct customer traffic to the fully interactive websites operating under the other Subject Domain
13 Names. Defendants are directly and personally contributing to, inducing and engaging in the sale of
14 counterfeit products as alleged herein, often times as partners, co-conspirators and/or suppliers.
15 Louis Vuitton is presently unaware of the true names of Does 1-1,000. Louis Vuitton will amend this
16 Complaint upon discovery of the identities of such fictitious Defendants.

17 7. Defendants are the past and present moving and conscious forces behind the
18 operation of the commercial Internet websites operating under the Subject Domain Names.

19 8. Upon information and belief, Defendants engage in the offering for sale and sale of
20 counterfeit and infringing Louis Vuitton branded products within this Judicial District through
21 multiple fully interactive commercial websites operating under at least the Subject Domain Names.
22 Defendants, upon information and belief, also operate additional websites which promote and offer
23 for sale counterfeit and infringing goods under domain names not yet known to Plaintiff.
24 Defendants have purposefully directed their illegal activities towards consumers in the State of
25 Nevada through the advertisement, offer to sell, sale and shipment of counterfeit Louis Vuitton
26 branded goods into the State.

9. Upon information and belief, Defendants will continue to register new domain names for the purpose of selling goods bearing counterfeits of Louis Vuitton's trademarks unless preliminarily and permanently enjoined.






10. Defendants' Internet-based website businesses amount to nothing more than massive illegal operations, infringing on the intellectual property rights of Louis Vuitton and others.








11. Defendants use and have registered, established or purchased and maintained and the Subject Domain Names. Upon information and belief, Defendants have engaged in fraudulent conduct with respect to the registration of the Subject Domain Names by providing false and/or misleading information to their various Registrars during the Registration or maintenance process.

12. Defendants' business names, i.e., the Subject Domain Names and any other domain names used in connection with the sale of counterfeits bearing Louis Vuitton's trademarks are essential components of Defendants' counterfeiting and infringing activities. The Subject Domain Names themselves are the means by which Defendants further their counterfeiting scheme and cause harm to Louis Vuitton. Moreover, Defendants are using Louis Vuitton's famous name and trademarks to drive Internet consumer traffic to their websites operating under the Subject Domain Names, thereby creating and increasing the value of the Subject Domain Names at Louis Vuitton's expense.

COMMON FACTUAL ALLEGATIONS

13. Louis Vuitton is the owner of all rights in and to the following trademarks which are valid and registered on the Principal Register of the United States Patent and Trademark Office:

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>
	0,297,594	September 20, 1932
LOUIS VUITTON	1,045,932	August 10, 1976
	1,519,828	January 10, 1989
	1,938,808	November 28, 1995
LOUIS VUITTON	1,990,760	August 6, 1996
	2,177,828	August 4, 1998
	2,181,753	August 18, 1998

1		2,361,695	June 27, 2000
2	 LOUIS VUITTON PARIS	2,378,388	August 22, 2000
3		2,399,161	October 31, 2000
4		2,421,618	January 16, 2001
5		2,773,107	October 14, 2003
6		3,023,930	December 6, 2005
7		3,051,235	January 24, 2006

8 (the "Louis Vuitton Marks") which are registered in International Classes 9, 14, 18, and 25, and are
 9 used in connection with the manufacture and distribution of, among other things, high quality
 10 handbags, wallets, luggage, shoes, belts, scarves, sunglasses, watches, and jewelry.

11 14. The Louis Vuitton Marks have been used in interstate commerce to identify and
 12 distinguish Louis Vuitton's high quality handbags, wallets, luggage, shoes, belts, scarves, sunglasses,
 13 watches, and jewelry and other goods for an extended period of time.

14 15. The Louis Vuitton Marks have never been assigned or licensed to any of the
 15 Defendants in this matter.

16 16. The Louis Vuitton Marks are symbols of Louis Vuitton's quality, reputation and
 17 goodwill and have never been abandoned.

18 17. Further, Louis Vuitton has expended substantial time, money and other resources
 19 developing, advertising and otherwise promoting the Louis Vuitton Marks. The Louis Vuitton Marks
 20 qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

21 18. Louis Vuitton has extensively used, advertised and promoted the Louis Vuitton
 22 Marks in the United States in association with the sale of high quality handbags, wallets, luggage,
 23 shoes, belts, scarves, sunglasses, watches, and jewelry, and other goods and has carefully monitored
 24 and policed the use of the Louis Vuitton Marks.

25 19. As a result of Louis Vuitton's efforts, members of the consuming public readily
 26 identify merchandise bearing the Louis Vuitton Marks, as being high quality luxury goods sponsored
 27 and approved by Louis Vuitton.

1 20. Accordingly, the Louis Vuitton Marks have achieved secondary meaning as
2 identifiers of high quality handbags, wallets, luggage, shoes, belts, scarves, sunglasses, watches, and
3 jewelry, and other goods.

4 21. Genuine Louis Vuitton branded goods are widely legitimately advertised and
5 promoted by Louis Vuitton, its authorized distributors and unrelated third parties via the Internet.
6 Over the course of the past five to seven years, visibility on the Internet, particularly via Internet
7 search engines such as Google, Yahoo! and Bing has become increasingly important to Louis
8 Vuitton's overall marketing and consumer education efforts. Thus, Louis Vuitton expends
9 significant monetary resources on Internet marketing and consumer education, including search
10 engine optimization ("SEO") strategies. Those strategies allow Louis Vuitton and its authorized
11 retailers to fairly and legitimately educate consumers about the value associated with the Louis
12 Vuitton brand and the goods sold thereunder. SEO is a now common marketing process whereby a
13 company or individual designs, supports, structures and phrases Internet website content in order to
14 enhance a website's profile for search engines over a variety of search terms.

15 22. Upon information and belief, at all times relevant hereto, Defendants in this action
16 have had full knowledge of Louis Vuitton's ownership of the Louis Vuitton Marks, including its
17 exclusive right to use and license such intellectual property and the goodwill associated therewith.

18 23. Louis Vuitton has discovered Defendants are promoting and otherwise advertising,
19 distributing, selling and/or offering for sale counterfeit products, including at least handbags, wallets,
20 luggage, shoes, belts, scarves, sunglasses, watches, and jewelry bearing trademarks which are exact
21 copies of the Louis Vuitton Marks (the "Counterfeit Goods"). Specifically, upon information and
22 belief, Defendants are using the Louis Vuitton Marks in the same stylized fashion, for different
23 quality goods.

24 24. Defendants' Counterfeit Goods are of a quality substantially different than that of
25 Louis Vuitton's genuine goods. Despite the nature of their Counterfeit Goods and the knowledge
26 they are without authority to do so, Defendants are actively using, promoting and otherwise
27 advertising, distributing, selling and/or offering for sale substantial quantities of their Counterfeit
28 Goods with the knowledge that such goods will be mistaken for the genuine high quality products

1 offered for sale by Louis Vuitton. The net effect of Defendants' actions will be to result in the
2 confusion of the relevant trade and consumers, both at the time of sale and in a post sale setting, who
3 will believe Defendants' Counterfeit Goods are genuine goods originating from, associated with, and
4 approved by Louis Vuitton.

5 25. Defendants advertise their Counterfeit Goods for sale to the consuming public. In so
6 advertising these products, Defendants improperly and unlawfully use the Louis Vuitton Marks.
7 Indeed, Defendants herein misappropriated Louis Vuitton's advertising ideas and entire style of
8 doing business with regard to the advertisement and sale of Louis Vuitton's genuine products. Upon
9 information and belief, the misappropriation of Louis Vuitton's advertising ideas in the form of the
10 Louis Vuitton Marks has occurred, in part, in the course of Defendants' advertising activities and has
11 been the proximate cause of damage to Louis Vuitton.

12 26. As part of their overall counterfeiting scheme, the Defendants are, upon information
13 and belief, all employing substantially similar, and often times coordinated, SEO strategies based, in
14 large measure, upon an illegal use of counterfeits of the Louis Vuitton Marks. Specifically, the
15 Defendants are using counterfeits of Louis Vuitton's name and the Louis Vuitton Marks in order to
16 make their websites selling illegal goods appear more relevant and attractive to search engines across
17 an array of search terms. By their actions, the Defendants are causing concurrent and indivisible
18 harm to Louis Vuitton and the consuming public by (i) depriving Louis Vuitton, its authorized
19 distributors and other third parties of the ability to fairly compete for space within search engine
20 results, (ii) causing an overall degradation of the value of the goodwill associated with the Louis
21 Vuitton Marks and (iii) increasing Louis Vuitton's overall cost to market its goods and educate
22 consumers about the brand via the Internet.

23 27. Upon information and belief, Defendants are concurrently conducting their
24 counterfeiting and infringing activities at least within this Judicial District and elsewhere throughout
25 the United States. As a result, Defendants are defrauding Louis Vuitton and the consuming public
26 for Defendants' own benefit. Defendants' infringement and disparagement of Louis Vuitton does not
27 simply amount to the wrong description of their goods or the failure of the goods to conform to the
28 advertised quality or performance.

1 28. Defendants' use of the Louis Vuitton Marks, including the promotion and
2 advertisement, reproduction, distribution, sale and offering for sale of their Counterfeit Goods, is
3 without Louis Vuitton's consent or authorization.

4 29. Further, Defendants are engaging in the above-described illegal counterfeiting and
5 infringing activities knowingly and intentionally or with reckless disregard or willful blindness to
6 Louis Vuitton's rights for the purpose of trading on the goodwill and reputation of Louis Vuitton.

7 30. Defendants' above-identified infringing activities are likely to cause confusion,
8 deception and mistake in the minds of consumers, the public and the trade. Moreover, Defendants'
9 wrongful use of the Louis Vuitton Marks is likely to create a false impression and deceive
10 customers, the public and the trade into believing there is a connection or association between Louis
11 Vuitton and Defendants' Counterfeit Goods.

12 31. Louis Vuitton has no adequate remedy at law.

13 32. Louis Vuitton is suffering irreparable and indivisible injury and damages as a result
14 of Defendants' unauthorized and wrongful use of the Louis Vuitton Marks. If Defendants'
15 counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court,
16 Louis Vuitton and the consuming public will continue to be harmed.

17 33. The injuries and damages sustained by Louis Vuitton have been directly and
18 proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering
19 to sell, and sale of their Counterfeit Goods.

20 34. Louis Vuitton has retained the undersigned counsel to represent it in this matter and is
21 obligated to pay said counsel a reasonable fee for such representation.

22 **COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT**

23 35. Louis Vuitton hereby readopts and re-alleges the allegations set forth in Paragraphs 1
24 through 34 above.

25 36. This is an action for trademark counterfeiting and infringement against Defendants
26 based on their use of counterfeits of the Louis Vuitton Marks in commerce in connection with the
27 promotion, advertisement, distribution, sale and/or offering for sale of the Counterfeit Goods.
28

1 37. Specifically, Defendants are promoting and otherwise advertising, selling, offering
2 for sale and distributing at least counterfeit and infringing handbags, wallets, luggage, shoes, belts,
3 scarves, sunglasses, watches, and jewelry bearing the Louis Vuitton Marks. Defendants are
4 continuously infringing and inducing others to infringe the Louis Vuitton Marks by using them to
5 advertise, promote and sell at least counterfeit handbags, wallets, luggage, shoes, belts, scarves,
6 sunglasses, watches, and jewelry.

7 38. Defendants' concurrent counterfeiting and infringing activities are likely to cause
8 and, upon information and belief, actually are causing confusion, mistake and deception among
9 members of the trade and the general consuming public as to the origin and quality of Defendants'
10 Counterfeit Goods bearing the Louis Vuitton Marks.

11 39. Defendants' unlawful actions have caused and are continuing to cause unquantifiable
12 damages to Louis Vuitton.

13 40. Defendants' above-described illegal actions constitute counterfeiting and
14 infringement of the Louis Vuitton Marks in violation of Louis Vuitton's rights under § 32 of the
15 Lanham Act, 15 U.S.C. § 1114.

16 41. Louis Vuitton has suffered and will continue to suffer irreparable injury due to the
17 above described activities of Defendants if Defendants are not preliminarily and permanently
18 enjoined.

19 **COUNT II - FALSE DESIGNATION OF ORIGIN**

20 **PURSUANT TO § 43(a) OF THE LANHAM ACT**

21 42. Louis Vuitton hereby readopts and re-alleges the allegations set forth in Paragraphs 1
22 through 34 above.

23 43. Defendants' Counterfeit Goods bearing and sold under the Louis Vuitton Marks have
24 been widely advertised and distributed throughout the United States.

25 44. Defendants' Counterfeit Goods bearing and sold under the Louis Vuitton Marks are
26 virtually identical in appearance to each of Louis Vuitton's respective genuine goods. However, the
27 Counterfeit Goods are different in quality. Accordingly, Defendants' activities are likely to cause
28

1 confusion in the trade and among the general public as to at least the origin or sponsorship of the
2 Counterfeit Goods.

3 45. Defendants, upon information and belief, have used in connection with their sale of
4 Counterfeit Goods, false designations of origins and false descriptions and representations, including
5 words or other symbols and trade dress which tend to falsely describe or represent such goods and
6 have caused such goods to enter into commerce with full knowledge of the falsity of such
7 designations of origin and such descriptions and representations, all to the detriment of Louis
8 Vuitton.

9 46. Specifically, Defendants have authorized an infringing use of the Louis Vuitton
10 Marks, in Defendants' advertisement and promotion of their counterfeit and infringing handbags,
11 wallets, luggage, shoes, belts, scarves, sunglasses, watches, and jewelry. Defendants have also
12 misrepresented to members of the consuming public that the Counterfeit Goods being advertised and
13 sold by them are genuine, non-infringing products.

14 47. Additionally, Defendants are using counterfeits of the Louis Vuitton Marks in order
15 to unfairly compete with Louis Vuitton and others for space within search engine organic results,
16 thereby depriving Louis Vuitton of a valuable marketing and educational tool which would
17 otherwise be available to Louis Vuitton.

18 48. Defendants' above-described actions are in violation of Section 43(a) of the Lanham
19 Act, 15 U.S.C. §1125(a).

20 49. Louis Vuitton has sustained indivisible injury and damage caused by Defendants'
21 concurrent conduct, and absent an entry of an injunction by this Court, Louis Vuitton will continue
22 to suffer irreparable injury to its goodwill and business reputation as well as monetary damages.

23 **COUNT III - CLAIM FOR RELIEF FOR CYBERPIRACY**

24 **UNDER §43(d) OF THE LANHAM ACTION, 15 U.S.C. §1125(d)**

25 50. Louis Vuitton hereby readopts and re-alleges the allegations set forth in Paragraphs 1
26 through 34 above.

27 51. At all times relevant hereto, Louis Vuitton has been and still is the owner of the
28 rights, title and interest in and to the Louis Vuitton Marks.

1 52. Upon information and belief, Defendants have acted with the bad faith intent to profit
2 from the Louis Vuitton Marks and the goodwill associated with the Louis Vuitton Marks by
3 registering various domain names which are identical or confusingly similar to or dilutive of the
4 Louis Vuitton Marks.

5 53. Defendants have no intellectual property rights in or to the Louis Vuitton Marks.

6 54. Defendants' actions constitute cyberpiracy in violation of §43(d) of the Lanham Act,
7 15 U.S.C. §1125(d).

8 55. Defendants' conduct is done with knowledge and constitutes a willful violation of
9 Louis Vuitton's rights in the Marks. At a minimum, Defendants' conduct constitutes reckless
10 disregard for and willful blindness to Louis Vuitton's rights.

11 56. The aforesaid conduct is causing Louis Vuitton damages and immediate and
12 irreparable injury. Louis Vuitton has no adequate remedy at law.

13 **COUNT IV - COMMON LAW UNFAIR COMPETITION**

14 57. Louis Vuitton hereby readopts and re-alleges the allegations set forth in Paragraphs 1
15 through 56 above.

16 58. This is an action against Defendants based on their manufacture, promotion,
17 advertisement, distribution, sale and/or offering for sale of goods bearing marks which are virtually
18 identical, both visually and phonetically, to the Louis Vuitton Marks in violation of Nevada's
19 common law of unfair competition.

20 59. Specifically, the Defendants are promoting and otherwise advertising, selling,
21 offering for sale and distributing infringing and counterfeit handbags, wallets, luggage, shoes, belts,
22 scarves, sunglasses, watches, and jewelry. The Defendants are also using counterfeits of the Louis
23 Vuitton Marks to unfairly compete with Louis Vuitton and others for space in search engine results
24 across an array of search terms.

25 60. Defendants' infringing activities are likely to cause and actually are causing
26 confusion, mistake and deception among members of the trade and the general consuming public as
27 to the origin and quality of Defendants' product by their use of the Louis Vuitton Marks.
28

1 61. The Plaintiffs have no adequate remedy at law and are suffering damages and
2 irreparable injury as a result of Defendants' actions.

3 **PRAYER FOR RELIEF**

4 62. WHEREFORE, Louis Vuitton demands judgment on all Counts of this Complaint
5 and an award of equitable relief against Defendants as follows:

6 a. Entry of preliminary and permanent injunction enjoining Defendants, their
7 agents, representatives, servants, employees, and all those acting in concert or participation
8 therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting,
9 distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or
10 diluting the Louis Vuitton Marks; from using the Louis Vuitton Marks, or any mark or trade dress
11 similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade
12 name or trademark or trade dress which may be calculated to falsely advertise the services or
13 products of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated
14 with Louis Vuitton; from falsely representing themselves as being connected with Louis Vuitton,
15 through sponsorship or association, or engaging in any act which is likely to falsely cause members
16 of the trade and/or of the purchasing public to believe any goods or services of Defendants, or in any
17 way endorsed by, approved by, and/or associated with Louis Vuitton; from using any reproduction,
18 counterfeit, copy, or colorable imitation of the Louis Vuitton Marks in connection with the publicity,
19 promotion, sale, or advertising of any goods sold by Defendants, including, without limitation,
20 handbags, wallets, luggage, shoes, belts, scarves, sunglasses, watches, and jewelry, and other goods;
21 from affixing, applying, annexing or using in connection with the sale of any goods, a false
22 description or representation, including words or other symbols tending to falsely describe or
23 represent Defendants' goods as being those of Louis Vuitton, or in any way endorsed by Louis
24 Vuitton and from offering such goods in commerce; from engaging in search engine optimization
25 strategies using colorable imitations of the Louis Vuitton name or Marks; and from otherwise
26 unfairly competing with Louis Vuitton.

27 b. Entry of an Order that, upon Louis Vuitton's request, those in privity with
28 Defendants, and those with notice of the injunction, including any Internet search engines, Web

1 hosts, domain-name registrars and domain-name registries that are provided with notice of the
2 injunction, cease facilitating access to any or all domain names and websites through which
3 Defendants engage in the sale of counterfeit and infringing goods using the Louis Vuitton Marks.

4 c. Entry of an Order that, upon Louis Vuitton's request, the top level domain
5 (TLD) Registries for the Subject Domain Names place the Subject Domain Names on Registry Hold
6 status, thus removing them from the TLD zone files maintained by the Registries which link the
7 Subject Domain Name to the IP address where the associated website is hosted.

8 d. Entry of an order canceling or, at Louis Vuitton's election, transferring the
9 Subject Domain Names and any other domain names used by the Defendants to engage in their
10 counterfeiting of the Louis Vuitton Marks at issue to Louis Vuitton's control so they may no longer
11 be used for illegal purposes.

12 e. Entry of an order that, upon Louis Vuitton's request, the Internet Corporation
13 for Assigned Names and Numbers ("ICANN") and the Internet Assigned Numbers Authority
14 ("IANA") shall each take all actions necessary to ensure that the top level domain Registries
15 responsible for the Subject Domain Names transfer and/or disable the Subject Domain Names as
16 directed by the Court.

17 f. Entry of an award of Louis Vuitton's costs and reasonable attorneys' fees and
18 investigative fees associated with bringing this action.

19 g. Entry of further relief as the Court may deem just and proper.

20 Dated: March ___, 2011

Respectfully submitted,

21 By: /s/ Ryan E. Johnson

22 Ryan E. Johnson (Nevada Bar # 9070)

23 WATSON ROUNDS

777 N. Rainbow Blvd., Suite 350

Las Vegas, NV 89107

24 *Of Counsel:*

25 Stephen M. Gaffigan

STEPHEN M. GAFFIGAN, P.A.

26 401 East Las Olas Blvd., Suite 130-453

27 Ft. Lauderdale, Florida 33301

Attorneys for Plaintiff

28 LOUIS VUITTON MALLETIER, S.A.

SCHEDULE A
THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS

1	
2	Defendant 1: 1854louisvuitton.com
3	Defendant 2: 21centurybags.co
4	Defendant 3: 21replica.com
5	Defendant 4: 3areplicawatch.com
6	Defendant 5: 7starplanet.com
7	Defendant 6: 86handbags.com
8	Defendant 7: 960watch.com
9	Defendant 8: abag2u.com
10	Defendant 9: acereplica.com
11	Defendant 10: amazing-bags.com
12	Defendant 11: amazingreplica.com
13	Defendant 12: bagreplicator.com
14	Defendant 13: bagsfactory.net
15	Defendant 14: bagspart.com
16	Defendant 15: besthandbagsstore.mdsoll.cn
17	Defendant 16: bestmirrorbrands.com
18	Defendant 17: best-replica-watch.com
19	Defendant 18: best-replica-watches.com
20	Defendant 19: beubag.com
21	Defendant 20: bipurse.com
22	Defendant 21: brandkeys.net
23	Defendant 22: buyawatches.com
24	Defendant 23: buycheapluxury.com
25	Defendant 24: buyreplicahandbags.info
26	Defendant 25: buysns.com
27	Defendant 26: cadudu.com
28	Defendant 27: chinese-replica.net
	Defendant 28: chinese-replicas.com
	Defendant 29: cnreplica-handbags.com
	Defendant 30: copycatshades.com
	Defendant 31: countbags.com
	Defendant 32: dedoro.com
	Defendant 33: designer-handbag-replica.com
	Defendant 34: designer-replicahandbags.com
	Defendant 35: discountbagsoutlet.com
	Defendant 36: discount-designer-bags.com
	Defendant 37: eluxuryking.com
	Defendant 38: eluxurys-mart.net
	Defendant 39: eluxuryxp.com
	Defendant 40: eshop4bags.com
	Defendant 41: etopbagss.com
	Defendant 42: exquisitebag.com
	Defendant 43: fabaaa.com
	Defendant 44: fakehandbagshome.com
	Defendant 45: fashionbagzoom.com a/k/a vuittonworld.com

Defendant 46: fashionboutiqueshop.com
 Defendant 47: fashionladybag.com
 Defendant 48: fashion-replica-bags.com
 Defendant 49: ffchloe.com
 Defendant 50: forevercbs.com
 Defendant 51: galaxysahandbags.com
 Defendant 52: goodluxuryshop.com
 Defendant 53: gooodbag.com
 Defendant 54: goto-watches.com
 Defendant 55: grabshandbags.com
 Defendant 56: groundmart.com
 Defendant 57: handbag20.com
 Defendant 58: handbag4s.com
 Defendant 59: handbagforever.com
 Defendant 60: handbagsbeauty.com
 Defendant 61: handbagsidol.com
 Defendant 62: handbagsmama.net
 Defendant 63: handbagsonsaleus.com
 Defendant 64: handbags-sales.com
 Defendant 65: handbagswin.com
 Defendant 66: handbagswow.com a/k/a creplicahandbags.com
 Defendant 67: haoreplica.com
 Defendant 68: herebagss.org
 Defendant 69: hereisbag.com
 Defendant 70: hightbrand.com
 Defendant 71: highwaywatches.com
 Defendant 72: honey-replicas.com
 Defendant 73: honey-replicas.net a/k/a honey-replicas.co
 Defendant 74: hot-louisvuitton.com
 Defendant 75: huebags.com
 Defendant 76: imposter-city.com
 Defendant 77: ireplical.net
 Defendant 78: itisdesigners.com
 Defendant 79: itisreplicas.com
 Defendant 80: jajashopping.com
 Defendant 81: jeanybags.com
 Defendant 82: knockoff-bags.com
 Defendant 83: knockoffhandbagsa.com
 Defendant 84: knockoffnamebag.com
 Defendant 85: louisvuitton4bag.com a/k/a eluxury4all.com
 Defendant 86: louisvuittonbrandbag.com
 Defendant 87: louisvuittonbrandbags.com
 Defendant 88: louisvuittonhandbagsshop.com
 Defendant 89: louisvuittonoutletonline.net
 Defendant 90: louisvuitton-outlet-stores.com a/k/a louis-vuitton-outlet-stores.net
 Defendant 91: louisvuittonreplica.org
 Defendant 92: louis-vuitton-replicas.com
 Defendant 93: louisvuittonsale-shop.com

Defendant 94: louisvuittonstuff.com
 Defendant 95: luxury-estore.com
 Defendant 96: luxurymirrorbrands.com
 Defendant 97: lv2get.com
 Defendant 98: lvbags.cc
 Defendant 99: lvoutletsale.com a/k/a e-fashionshopping.com and luxury-estore.com
 Defendant 100: lvuksale.com
 Defendant 101: memwatches.com
 Defendant 102: mirrorbrands.com
 Defendant 103: mobigarden.com
 Defendant 104: mybagwow.com a/k/a handbagsmars.com
 Defendant 105: mychanelhandbags.com
 Defendant 106: mylvlife.com
 Defendant 107: myshopwww.com
 Defendant 108: newbagsonsale.com a/k/a newbagpurse.com
 Defendant 109: newlouisvuitton.com
 Defendant 110: nexthandbags.com
 Defendant 111: omegarecall.com
 Defendant 112: onebags.com
 Defendant 113: orderluxurybag.com a/k/a vuittonworld.com
 Defendant 114: perfect-replica-handbags.com a/k/a creplicahandbags.com
 Defendant 115: pop-handbags.com
 Defendant 116: popreplicas.com
 Defendant 117: popswisswatches.com
 Defendant 118: pop-watches.com
 Defendant 119: poshmoda.com
 Defendant 120: poshreplica.com
 Defendant 121: purereplicabags.com
 Defendant 122: pursestore.uk.com
 Defendant 123: pursestrade.com
 Defendant 124: replica2louisvuitton.com
 Defendant 125: replica4lv.com
 Defendant 126: replica4lvbags.com
 Defendant 127: replicabaghome.com
 Defendant 128: replica-bags8.com
 Defendant 129: replicadesignerhandbag.net
 Defendant 130: replicahandbagclub.com
 Defendant 131: replicahandbags4.com
 Defendant 132: replicahandbagsale-online.com
 Defendant 133: replicahandbagsbox.com
 Defendant 134: replicahandbagspro.com
 Defendant 135: replica-handbags-shop.com
 Defendant 136: replica-louis.com a/k/a lvhandbagsol.com
 Defendant 137: replicaok.net
 Defendant 138: replicasky.com
 Defendant 139: replicaslv.com
 Defendant 140: replica-watch.co
 Defendant 141: replicawatch-uk.com

Defendant 142: replicawell.com
 Defendant 143: replicawholesalesunglasses.com
 Defendant 144: salelouisvuitton.com
 Defendant 145: salelouisvuittonbags.com
 Defendant 146: seasoneshandbags.com
 Defendant 147: seasonsehandbags.com
 Defendant 148: sell-brands.com
 Defendant 149: sell-replica.com
 Defendant 150: shayes.com
 Defendant 151: shoplouisvuittonreplica.com
 Defendant 152: shopping-eluxury.com
 Defendant 153: shopyep.com
 Defendant 154: showmywatch.com
 Defendant 155: spotbags.net a/k/a pursevalley.com
 Defendant 156: superbaghome.com
 Defendant 157: super-replica.com
 Defendant 158: swissbestwatch.com
 Defendant 159: swissmirrorwatch.com
 Defendant 160: thehandbags.us
 Defendant 161: thereplicabag.com
 Defendant 162: thesunglassmanonline.com
 Defendant 163: thewatch88.com
 Defendant 164: topluxurystore.com
 Defendant 165: topreplicahandbags8.com
 Defendant 166: toshopbag.com
 Defendant 167: ugglvgucci.com
 Defendant 168: uuhandbags.com
 Defendant 169: voguebags.com
 Defendant 170: voguewear.com
 Defendant 171: walletskey.com
 Defendant 172: watch126.com
 Defendant 173: watchbrandhome.com
 Defendant 174: watchesbit.com
 Defendant 175: watchesbrand.net
 Defendant 176: watchvipshop.com
 Defendant 177: wbrandbags.com
 Defendant 178: webbags.org
 Defendant 179: westoffer.com
 Defendant 180: wowyahoo.com
 Defendant 181: wsreplicas.com
 Defendant 182: yeahlvwallets.com